

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP
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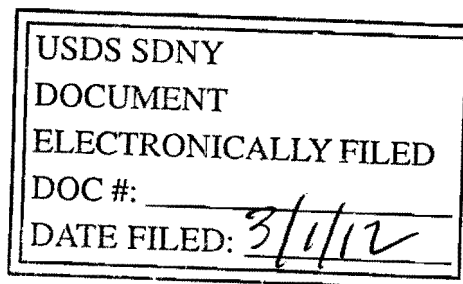
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February 27, 2012

Via Facsimile – (212) 805-7901

Honorable Harold Baer, Jr.
United States District Judge
United States Courthouse
500 Pearl Street
Room 2230
New York, New York 10007



Re: United States v. Carollo, et al.
10-CR-654 (HB)

Dear Judge Baer:

Pursuant to the Court's Order and Federal Rule of Criminal Procedure 49.1, we write to request Your Honor's permission to file under seal two memoranda of law in support of Defendant Carollo's motions in limine and two declarations of Walter F. Timponc in support of the same. The memoranda and Declarations contain information that is confidential and subject to the Protective Order endorsed by the Court on December 6, 2010. We, therefore, respectfully request leave to file the aforementioned documents under seal.

Respectfully submitted,

McElroy, Deutsch, Mulvane & Carpenter, LLP

Walter F. Timponc
Walter F. Timponc

WFT/dms

cc: All Counsel of Record (via email)

SO ORDERED:
Harold Baer, Jr.
Harold Baer, Jr., U.S.D.J.
Date: 3/1/12